

Verified Complaint

IN THE UNITED STATES DISTRICT COURT

ROVD - USDC COLA SC
JUN 24 '25 PM3:01

FOR THE DISTRICT OF SOUTH CAROLINA – COLUMBIA DIVISION

Miyuki Maureen Johnson, Trustee for

Miyuki Maureen Johnson Irrevocable Trust,

Civil Action No. 3:25-cv-06162-JFA-SVH

Plaintiff,

v.

Synchrony Bank,

Defendant.

COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

Plaintiff, Miyuki Maureen Johnson, acting as Trustee for the Miyuki Maureen Johnson Irrevocable Trust, files this Verified Complaint against Synchrony Bank, and alleges as follows:

1. Plaintiff is the duly appointed Trustee of the Miyuki Maureen Johnson Irrevocable Trust, a private irrevocable trust with a principal address at 401 McNulty Street, STE #345, Blythewood, SC 29016.
2. Defendant Synchrony Bank is a financial institution with a primary mailing address of PO Box 653074, Dallas, TX 75265-3074.

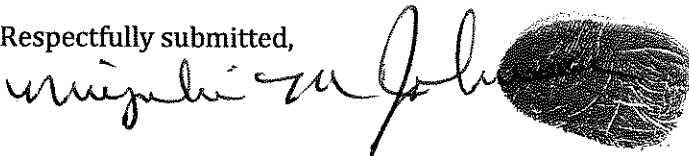
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3. On or about June 9, 2025, Plaintiff submitted a lawful A4V (Accepted for Value) remittance to discharge the full account balance of \$11,695.29 for the financing of an upstairs central air conditioning unit.
4. Defendant received the remittance package and failed to provide a lawful rebuttal, rejection, or return within the 72-hour window or the 15-day rebuttal period required by commercial law.
5. As of this date, the financing agreement remains unrebutted, with no written response from the Defendant.
6. Defendant's dishonor and continued balance reporting constitute commercial default under UCC 3-603 and 3-311, and unlawful coercive pressure against the Trustee.
7. Plaintiff is a retired federal employee and disabled individual entitled to protections under the ADA (42 USC § 12101 et seq.).

WHEREFORE, Plaintiff demands judgment against Defendant as follows:

- (a) For damages in the amount of \$100,000;
- (b) For injunctive relief to stop further collection activity;
- (c) For legal and administrative costs;
- (d) For all other relief the Court deems just and proper.

Respectfully submitted,



Miyuki Maureen Johnson

Trustee, Miyuki Maureen Johnson Irrevocable Trust

401 McNulty Street, STE #345

Blythewood, SC 29016

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